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6 Attorneys for Defendant
Mr. Fernandez-Carranza
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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) Case No. 2:21-CR-86-TLN
11 Plaintiff,)
12 vs.) **STIPULATION AND ORDER TO CONTINUE**
13) **STATUS CONFERENCE AND EXCLUDE TIME**
14 PIOQUINTO FERNANDEZ-)
CARRANZA,) Date: June 10, 2021
15 Defendant.) Time: 9:00 a.m.
Judge: Hon. Troy L. Nunley

16 IT IS HEREBY STIPULATED and agreed by and between Acting United States
17 Attorney Phillip A. Talbert, through Assistant United States Attorney Samuel Stefanki, counsel
18 for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender
19 Hootan Baigmohammadi, counsel for Defendant Pioquinto Fernandez-Carranza, that the status
20 hearing currently set for June 10, 2021 at 9:30 be continued to August 5, 2021 at 9:30 a.m.

21 The parties specifically stipulate as follows:

- 22 1. By previous order, this matter was set for a status on June 10, 2021 at 9:30 a.m.
- 23 2. By stipulation, Mr. Fernandez-Carranza now moves to continue the status
24 conference to August 5, 2021 at 9:30 a.m.
- 25 3. The government recently sent 469 pages and four audio files of discovery to the
26 defense.
- 27 4. The defense requires additional time to review the discovery, investigate and
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research possible defenses, research potential pretrial motions, consult with Mr. Fernandez-Carranza, explore potential resolutions to the case, and otherwise prepare for trial.

5. Defense counsel believes that failure to grant the requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
6. The government does not object to the continuance.
7. Therefore, the parties stipulate that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Fernandez-Carranza in a speedy trial, and request the Court so to find.
8. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between June 10, 2021 and August 5, 2021, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and Mr. Fernandez-Carranza in a speedy trial.

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Respectfully submitted,

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Date: June 4, 2021

HEATHER E. WILLIAMS
Federal Defender

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Fernandez-Carranza

Date: June 4, 2021

PHILLIP A. TALBERT
United States Attorney

/s/ Samuel Stefanki
SAMUEL STEFANKI
Assistant United States Attorney
Attorneys for Plaintiff

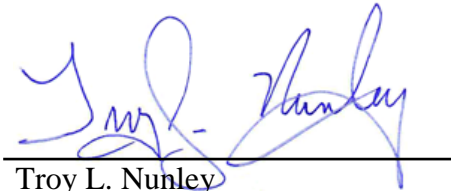
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ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: June 7, 2021


Troy L. Nunley
United States District Judge